

### III. REMARKS

Claims 1-20 are pending in this application. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-20 are rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Kurihara et al. (U.S. Pub. 2003/0171963), hereinafter “Kurihara”. Applicants respectfully traverse this rejection for the reasons stated below.

Specifically, with respect to independent claims 1, 12 and 16, Kurihara does not disclose, *inter alia*, “determining an excess inventory with consideration of a manufacturing limitation and an excess inventory without consideration of the manufacturing limitation for each analysis point[.]” (Claim 1, similarly in claims 12 and 16). Steps S7 and S8 of Kurihara deals with the processing of products (see paragraphs 0070 and 0071), and the storage and delivery of manufactured products (paragraph0072), but do not disclose determining an excess inventory. That is, the steps S7, S8 of Kurihara may include manufacturing limitation, but does not determine excess inventory with or without considering the manufacturing limitation.

In addition, Kurihara does not disclose, *inter alia*, “determining a trapped inventory based on a difference between the excess inventory with consideration of the manufacturing limitation and the excess inventory without consideration of the manufacturing limitation[.]” (Claim 1, similarly in claims 12 and 16). Step S13 of Kurihara discloses determining a target value of product inventory but the target value is based on the manufactory planning and the delivery

planning process. (*See* FIG. 3, S7 and S8.) That is, Kurihara does not determine a trapped inventory based on a difference between the excess inventory with consideration of the manufacturing limitation and the excess inventory without consideration of the manufacturing limitation, as the Kurihara always considers the manufacturing planning.

In view of the foregoing, Kurihara does not anticipate the claimed subject matter. The dependent claims are believed allowable for the same reasons stated above, as well as for their own additional features. Accordingly, Applicants respectfully request withdrawal of the rejection.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

/Jianping Zhang/

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